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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

This document relates to:

ALL ACTIONS

MDL No. 2843
Case No. 18-md-02843-VC-JSC

**STIPULATION AND [PROPOSED]
ORDER MODIFYING CASE SCHEDULE
AS MODIFIED**
Judge: Hon. Vince Chhabria

Pursuant to Civil Local Rules 6-2 and 7-12, this joint stipulation to modify the case schedule is entered into between Plaintiffs and Facebook, Inc., collectively referred to as “the Parties.”

WHEREAS, on July 19, 2021, the Court issued an Order Setting Case Schedule (Dkt. No. 706);

WHEREAS, the Parties continue to resolve remaining discovery issues, including document production, and fact and corporate witness depositions;

WHEREAS, the parties have met and conferred and have agreed to a three-month extension of existing deadlines;

NOW THEREFORE, the Parties hereby stipulate, subject to Court approval, to the following revised case schedule:

Event	Previous Deadline	New Deadline
Close of Fact Discovery (except discovery regarding documents withheld as privileged)	June 17, 2022	September 16, 2022
Initial Expert Disclosures for both sides (excluding experts relating to damages whose testimony is not relevant to class certification)	July 15, 2022	October 21, 2022
Rebuttal Expert Disclosures for both sides (with exception noted above)	August 19, 2022	November 18, 2022
Close of Expert Discovery (with exception noted above)	September 19, 2022	January 13, 2023
Last day for hearing on class certification	December 15, 2022	March 17, 2023

Dated: April 1, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

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By: /s/ Lesley E. Weaver
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ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Lesley E. Weaver, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of April, 2022, at Oakland, California.

/s/ Lesley E. Weaver

Lesley E. Weaver

~~[PROPOSED] ORDER~~

Pursuant to stipulation of the Parties, the Court modifies the case schedule as follows:

Event	Previous Deadline	New Deadline
Close of Fact Discovery (except discovery regarding documents withheld as privileged)	June 17, 2022	September 16, 2022
Initial Expert Disclosures for both sides (excluding experts relating to damages whose testimony is not relevant to class certification)	July 15, 2022	October 21, 2022
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The parties must comply with both the Court's Civil Standing Order and Standing Order for Civil Trials for additional deadlines and procedures. All Standing Orders are available on the Court's website at <https://cand.uscourts.gov/judges/chhabria-vince-vc/>. The remaining deadlines will be set at the January 2023 case management conference.

A further case management conference is scheduled for June 8, 2022, at 1:00 p.m.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Date: April 6, 2022

